

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

APR 23 2015

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS
EAST ST. LOUIS OFFICE

UNITED STATES OF AMERICA,)

Plaintiff,)

vs.)

MARTESE O. TEMPLE, SR.,)

Defendant.)

Criminal No. 15-30055-MJR

Title 18, United States Code,
Sections 641, 1001 and 1920

INDICTMENT**THE GRAND JURY CHARGES:**

At all times relevant and material to this Indictment:

COUNT 1**Theft of Government Funds**

1. From on or around September 10, 2009, continuing to on or around July 17, 2014, in Saint Clair County, Illinois, within the Southern District of Illinois, and elsewhere,

MARTESE O. TEMPLE, SR.,

defendant, did knowingly and willfully embezzle, steal, purloin and convert to his own use, monies belonging to the United States Postal Service, an agency of the United States, the United States Department of Labor – Office of Workers' Compensation Programs, and the United States of America, having a value in excess of \$1,000.00. Specifically, the defendant concealed the true state of his health and falsely and fraudulently represented that he suffered from a serious foot injury when in fact he then and there

knew that he did not suffer from such a serious injury, causing the defendant to obtain compensation and benefits in excess of \$1,000.00; all in violation of Title 18, United States Code, Section 641.

COUNT 2

Workers' Compensation Fraud

2. From on or around September 10, 2009, continuing to on or around July 17, 2014, in Saint Clair County, Illinois, within the Southern District of Illinois, and elsewhere,

MARTESE O. TEMPLE, SR.,

defendant, did knowingly and willfully make false and fraudulent statements and representations on a United States Department of Labor – Office of Workers' Compensation Programs' Form CA-1, "Federal Employee's Notice of Traumatic Injury and Claim for Continuation of Pay/Compensation," in connection with the receipt of compensation and payments under subchapter I and III of chapter 81 of Title 5, United States Code. Specifically, the defendant concealed the true state of his health, and falsely and fraudulently represented that he suffered from a serious foot injury when he in fact he then and there well knew that did not suffer from such a serious injury, causing the defendant to obtain compensation and benefits in excess of \$1000; all in violation of Title 18, United States Code, Section 1920.

COUNT 3

Making a False Statement to a Government Agency

3. From on or around September 10, 2009, continuing to on or around July 17, 2014, in Saint Clair County, Illinois, within the Southern District of Illinois, and


elsewhere,

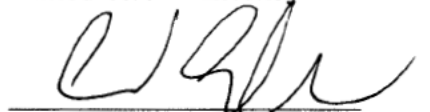
MARTESE O. TEMPLE, SR.,

defendant, did willfully and knowingly make a materially false, fictitious, or fraudulent statement or representation in a matter within the jurisdiction of the executive branch of the Government of the United States by making a false representation on an United States Department of Labor – Office of Workers’ Compensation Programs’ Form CA-1, “Federal Employee’s Notice of Traumatic Injury and Claim for Continuation of Pay/Compensation” and by making false in statements to United States Postal Service investigators in connection with the receipt of compensation and payments under subchapter I and III of chapter 81 of Title 5, United States Code. Specifically, the defendant concealed the true state of his health and falsely and fraudulently represented that he suffered from a serious foot injury when in fact he then and there knew that he did not suffer from such a serious injury. The defendant also concealed the true state of his health in failing to meet an affirmative duty to return to work when he was physically able to do so; all in violation of Title 18, United States Code, Section 1001.

A TRUE BILL

FOREPERSON


STEPHEN R. WIGGINTON
United States Attorney


WILLIAM E. COONAN
Assistant United States Attorney

Recommended Bond: \$10,000 unsecured